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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

29 UNITED STATES OF AMERICA, for the ) Case No. 2:20-cv-00790-JAD-NJK  
30 use and benefit of SUSTAINABLE )  
31 MODULAR MANAGEMENT, INC., a )  
32 Texas corporation )  
33 Plaintiff, ) JOINT STIPULATION REGARDING  
34 v. ) DEPOSITION SCHEDULE  
35 )  
36 JE DUNN CONSTRUCTION COMPANY; )  
37 FEDERAL INSURANCE COMPANY; )  
38 HARTFORD FIRE INSURANCE )  
39 COMPANY; TRAVELERS CASUALTY )  
40 AND SURETY COMPANY OF )  
41 AMERICA; DOE Individuals I-X and ROE )  
42 Entities I-X, inclusive, )  
43 Defendants. )  
44 )  
45 )

Consistent with this Court’s Order [Dkt. 95] regarding the Renewed Joint Stipulation and Order to Extend Discovery and Related Deadlines [Dkt.94], the Parties submit this Joint Stipulation Regarding Deposition Schedule. This stipulation is made by and between all parties to this consolidated action (United States of America, for the use and benefit of Sustainable Modular Management, Inc. (“SMM”); JE Dunn Construction Company (“JE Dunn”); Harford Fire Insurance Company (“Hartford”); Travelers Casualty and Surety Company of America (“Travelers”); Federal Insurance Company (“Federal”); and Pacific Indemnity Company (“Pacific”) through their respective counsel (collectively, the “Parties.”).

1. The schedule for completing all remaining depositions is as follows:

Deponent	Date	Location
Eli Kaldahl	April 18, 2023	Kansas City, Missouri
Craig Stearns	April 20, 2023	Kansas City, Missouri
Neal Gaudion	April 25, 2023	Phoenix, Arizona
Jeramy Bristol (Begin am)/ Rick Bartolotti (Begin pm)/	April 26, 2023	Phoenix, Arizona
Joe Waters (am)	April 27, 2023	Phoenix, Arizona
Kevin Purvis	May 8, 2023	Dallas, Texas
Kevin Finn	May 9, 2023	Dallas, Texas
Barry Bray	May 11, 2023	Zoom
Nick Mackie	May 17, 2023	Dallas, Texas
Bill Schwartzkopf	May 31, 2023	Denver, Colorado
Army Corps of Engineers Representative	Floating as non- party witness <sup>1</sup>	Little Rock, Arkansas (anticipated)

<sup>1</sup> Sustainable Modular Management plans to notice this deposition. The Assistant United States Attorney handling the scheduling of this deposition has not yet provided available dates for this deposition. Because this deposition involves a non-party, Government witness, SMM and JE Dunn have agreed to cooperate in setting this deposition once the Government provides available dates.

## STIPULATION

NOW, THEREFORE, the Parties hereby stipulate and agree to the Deposition Schedule as described herein.

## IT IS SO STIPULATED.

DATED this 7<sup>th</sup> day of April, 2023.

## MORRIS LAW GROUP

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With respect to the deposition of the Army Corp of Engineers, Sustainable Modular Management must promptly provide the assigned AUSA with a copy of the order at Docket No. 95. A stipulation with a firm deposition date for the Army Court of Engineers must be filed by April 24, 2023.

## ORDER

IT IS SO ORDERED.

*[Signature]*  
United States Magistrate

DATED April 10, 2023